

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

KATHRYN BAUMAN RUBENSTEIN, )  
                                  )  
Plaintiff,                    )  
                                  )  
v.                             )                           **CIVIL CASE NO. 1:07cv798-MHT**  
                                  )  
JAMES D. HAMLETT, Esq., et al., )  
                                  )  
Defendants.                  )

**REQUESTS FOR PRODUCTION OF DOCUMENTS TO THE PLAINTIFF**

COMES NOW Defendant James D. Hamlett and hereby requests that the Plaintiff produce the following documents as required by the *Alabama Rules of Civil Procedure*:

1. Any and all invoices, bills, payment histories, cancelled checks, charge ledgers, etc. representing expenses incurred by or on behalf of the plaintiffs as a result of the incidents described in the plaintiff's lawsuit.
2. Copies of any and all reports from any experts consulted by or on behalf of the plaintiff.
3. Plaintiff's income tax records, state and federal, for the five years preceding the date of this request.
4. The CV of any expert hired and/or consulted by or on behalf of the plaintiff.
5. Any and all documents upon which the plaintiff relied or to which the plaintiff referred in answering the defendants' interrogatories.
6. Copies of any and all documents which you or anyone acting on your behalf

have ever received from any defendant or any agent or employee of any defendant which relates in any way to this lawsuit.

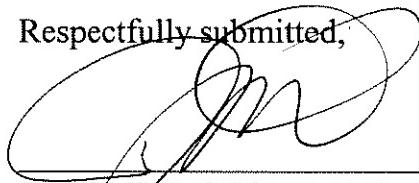
7. Any and all audio tapes, video tapes, transcriptions, etc., of any conversations that have ever occurred between or among the Plaintiff, and/or any employee or agent thereof, and any defendant in this action, or any employee or agent thereof.

8. Please provide a copy of any document submitted by you or on your behalf to any expert in this matter.

9. Please produce a copy of any file maintained by your expert(s) arising out of or related to the above styled cause of action.

10. Provide all documents which you claim memorialize in any way the scope of legal services to be provided to you by the Defendants in this case.

11. Any and all documents in your possession which support your claims of the malpractice.

Respectfully submitted,  


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**JOSEPH E. STOTT (ASB-4163-T71J)**  
Attorney for Defendant James D. Hamlett

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

This is to certify that on October 19, 2007, I filed the foregoing and sent notification of such filing to counsel who are listed as CM/ECF participants via email only: Wade H. Baxley, Esq., Don P. Bennett, Esq. Jack M. Conaway, Esq., James D. Farmer, Esq., Robert M. Girardeau, Esq., William W. Hinesley, Esq., William L. Lee, III, Esq., Steve G. McGowan, Esq., Virginia L. McInnis, Esq., R. Cliff Mendheim, Esq., William W. Nichols, Esq., Jere C. Segrest, Esq., Phillip D. Segrest, Jr., Esq., Gary C. Sherrer, Esq., John A. Smyth, III, Esq., Anne S. Sumblin, Esq., Joel W. Weatherford, Esq., F. Chadwick Morriss, Esq., Bethany L. Bloger, Esq., T. Grant Sexton, Esq., and I hereby certify that I have mailed by United States Postal Service the document to all non-CM/ECF participants:

Ms. Judy Byrd  
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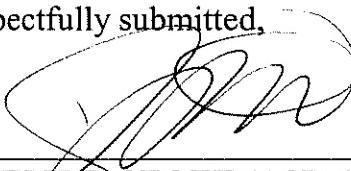
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Respectfully submitted,



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